

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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DISABILITY RIGHTS PENNSYLVANIA,

Plaintiff

v.

ERIE COUNTY, PENNSYLVANIA,

Defendant

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Civil Action No. 1:19-cv-00062-SPB

**MOTION REQUESTING ORDER**  
**CONFIRMING CONSENT DECREE**

Defendant, Erie County, requests that the Court enter an order confirming the parties' consent decree, and, in support thereof, states as follows:

1. Attached as Exhibit A to this Motion is a fully executed Consent Decree resolving the above-captioned matter. Paragraph 7 of the Consent Decree provides as follows:

Within ten (10) of the Execution of the Consent Decree, the Parties will submit a proposed Order to the Court that:  
(a) approves the Consent Decree, dismisses the Plaintiff's claims and incorporates the Consent Decree by reference in the Order; and (b) provides that the Court will retain continuing jurisdiction to interpret and enforce the Consent Decree.

2. The parties have been unable to agree on the exact wording of the proposed Order which would serve to confirm the Consent Decree. Attached as Exhibit B is the County's proposed Order. Attached as Exhibit C is the Plaintiff's proposed Order.

3. The parties have attempted unsuccessfully to resolve the matter of the wording of the proposed Order, as confirmed in the attached Exhibit D, representing the

texts of electronic mail exchanges which will serve to set forth the parties' respective positions regarding their respective versions of the proposed Order.

4. Defendant believes that the appropriate way to resolve this difference of opinion is to simply allow the court to issue an Order it deems appropriate confirming the Consent Decree so that this matter will be finally resolved.

WHEREFORE, Defendant requests that an Order be issued affirming the Consent Decree in all respects and retaining jurisdiction for the purpose of enforcing the terms of the Decree, if necessary.

Respectfully submitted,

COUNTY OF ERIE

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